

Honorable Mary Jo Heston
Hearing Date: 8/29/2023
Hearing Time: 1:00 PM
Response Date: 8/22/2023
Chapter 13
Via zoom.gov

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

In re:)
) **No. 23-40812**
MICHAEL DEAN LEA)
)
) **MOTION TO DISALLOW**
Debtor) **CLAIM(S) #2 REGIONAL ACCEPTANCE**
) **CORPORATION WITH NOTICE OF**
) **HEARING AND PROOF**
) **OF SERVICE**

NOTICE

YOU ARE HEREBY NOTIFIED that a hearing on the debtors' Objection to Proof of Claim(s) will be heard before The Honorable Mary Jo Heston on ***August 29, 2023 via zoom.gov***

Please do not attempt to record this session. It is prohibited.
Please set your Zoom user name to show your first and last name only: Jane Doe, John Doe...(this will make it easier for the judge to identify parties)
If you are disconnected from the session and can't rejoin, email the judge's Courtroom Deputy at: Samantha.Bergeson@wawb.uscourts.gov
Please join this Zoom session 15 mins prior to the scheduled start of the hearing.

CONNECTING TO THE SESSION

If attending this meeting via Video: Select the "Join ZoomGov Meeting" link below to join the session.
If attending this meeting via Phone-only (no video) (Judge's approval required prior to hearing): Cell phone users: Select one of the "One tap mobile" (San Jose) options listed below to connect Landline users: Dial one of the "Dial by your location (San Jose)" numbers listed below > Enter the "Meeting ID" when prompted > Press # when prompted for your "Personal Meeting ID"

TIPS FOR SUCCESS

Choose a quiet location without distractions.
Choose an area with good light, but not too much bright light behind you.

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For better sound quality, use a headset with built-in mic (or make sure you are close to your microphone).
Turn off apps that have built-in sounds, minimizing background noise.
Check and confirm, in advance of the hearing, that you have a working camera and microphone on your device. If
you run into technical issues or have questions, send email to: curtis_udy@wawb.uscourts.gov

ZOOMGOV ACCESS INFORMATION

Join ZoomGov Meeting

<https://www.zoomgov.com/j/1614865555?pwd=Q0kyVmZaaGFidXMyQ1daQXFxdVRuQT09>(link is external)

Meeting ID: 161 [486 5555](#)

Passcode: 827542

One tap mobile

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[+1 646 828 7666](tel:+16468287666) US (New York)

[+1 551 285 1373](tel:+15512851373) US

Meeting ID: 161 [486 5555](#)

Find your local number:

<https://www.zoomgov.com/u/aCksE5Pde>(link is external) (link is external)

IF YOU CHOOSE TO RESPOND to this motion, you must do so by ***August 22, 2023***
by serving a copy of your response on debtors' counsel and on the U.S. Trustee. If you fail to
do so, the Court may enter an order granting the motion without any hearing and without any
further notice to you.

OBJECTION

COMES NOW the above-referenced Debtor(s), by and through attorneys Ellen Ann
Brown and Susan H. Seelye of Brown and Seelye, and presents this **Objection to Claim(s)**
No. 2 filed by Regional Acceptance Corporation on the grounds indicated below:

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2
3 Regional Acceptance Corporation is a secured debt which is being paid outside of the Plan
4 by the co-signor (Debtor's daughter). As evidenced by the Proof of Claim the payments are
5 current.

6
7 This claim should be disallowed to be consistent with the provisions of the Plan Section X(B)
8 which states: **The 2020 Corolla is daughter's car in her possession and being**
9 **paid by her. This payment shall be made directly by her as the co-signor**
10 **outside of the Plan. Payments are current.**

11
12
13 For the reasons set forth above, the Debtor requests that the court enter an order sustaining this
14 Objection and disallowing this claim as a secured debt and allowing only as an unsecured debt.

15 Dated July 11, 2023.

16 /s/ Ellen Ann Brown
17 Ellen Ann Brown WSB#27992
Attorney for Debtor

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CERTIFICATE OF MAILING

I declare under penalty of perjury under the laws of the State of Washington as follows:

An objection to PROOF OF CLAIM, NOTICE OF HEARING ON OBJECTION, AND
CERTIFICATE OF MAILING with PROPOSED ORDER to the following:

Chapter 13 Trustee & U.S. Trustee's Office

And mailed via regular US Mail to the address listed on Proof of Claim #2:

Regional Acceptance Corporation, PO BOX 1847, Wilson, NC 27894

Dated July 11, 2023

/s/ Ellen Ann Brown

Ellen Ann Brown

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